

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

PAM SANFORD

Plaintiff,

V.

TETRA TECH, INC.

Defendant.

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) Case No.: 1:21-cv-00260-TSE-MSN
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PLAINTIFF'S WITNESS LIST

COMES NOW the Plaintiff, Pam Sanford, by counsel, and, pursuant to this Court's Scheduling Order, the Local Rules of this Court, and Federal Rules of Civil Procedure 26, submits the following list of witnesses ("Witness List"). Plaintiff submits this Witness List without waiving any of Plaintiff's rights, including but not limited to the following reservation of rights:

1. Plaintiff reserves the right to use and/or call on any witnesses designated by the Defendant, Tetra Tech, Inc. (“TTI” or “Defendant”).
2. Plaintiff reserves the right to use, in whole or in part, the deposition transcripts for the depositions taken in this case.
3. Plaintiff reserves the right to use any prior recorded testimony or sworn statement of any witness that is unavailable to testify at trial.
4. Plaintiff reserves the right to submit any additional witnesses for the purposes of rebuttal and/or impeachment as may arise at trial.
5. Plaintiff reserves the right to amend and/or supplement Plaintiff’s Witness List to include any subsequently discovered witnesses identified in discovery or by the Defendant after

submission of this Witness List including, without limitation, depositions conducted after this submission and potential witnesses cited in or relied on in discovery or motion practice by either party and to the extent necessary to rebut witnesses and evidence presented by Defendant at trial and as permitted by the Court and/or the Federal Rules of Civil Procedure.

WITNESS LIST AND DEPOSITION DESIGNATIONS

Plaintiff would prefer live testimony to using deposition designations other than for impeachment/rebuttal purposes, as it intends to call any witness for live testimony and is unaware of any current conflicts to a witness's appearance, unless one of Defendant's employees or ex-employees becomes unavailable for some reason. At such time, Plaintiff would request to do a de benne esse deposition and designate it from a raw transcript, or, use the discovery deposition taken if said deponent is unavailable. However, Plaintiff is aware that Lee U'Ren is in Washington State and no longer works for Defendant. In an abundance of caution, Defendant will designate the following sections of Mr. Lee U'Ren's deposition in the event he is unavailable to appear live. Lee U'Ren deposition designation sections: All of pages 1, 2, 3, 21, 22, 57, 58, 59, 62, and 63. (1, 2, and 3 are introductory and non-substantive).

A. Plaintiff *expects* to call the following fact witnesses at trial:

1. Pam Sanford, Plaintiff. She may be reached through Plaintiff's counsel of record.
2. Lisa Washington, former employee of Defendant. She may be reached through Plaintiff's counsel of record.
3. Lee U'Ren, Employee of Defendant. Plaintiff's direct supervisor. May be contacted through Defendant's counsel.
4. Kelli Zimmerman. Employee of Defendant. May be contacted through Defendant's

counsel.

5. Bonnie Brandbreth, employee of Defendant. May be contacted through Defendant's counsel.

B. Witnesses Plaintiff *May* Call:

1. Jennifer Hara. Former Employee of Defendant. Contact through Defendant's counsel at last known address.
2. Danyal Ahmad. Employee of Defendant. May be contacted through Defendant's counsel.
3. Marcus Hall. Employee of Defendant. May be contacted through Defendant's counsel.
4. Anastasia Anderson. Employee of Defendant. May be contacted through Defendant's counsel.
5. Austin Engle. Employee of Defendant. May be contacted through Defendant's counsel.
6. Marc Shaffer. Employee of Defendant. May be contacted through Defendant's counsel.
7. Barbara Cornett. Employee of Defendant. May be contacted through Defendant's counsel.
8. Sue Phipps. Employee of Defendant. May be contacted through Defendant's counsel.
9. Katie Sabella. Employee of Defendant. May be contacted through Defendant's counsel.
10. Tetra Tech, Inc. – Corporate rep./custodian of records. Contacted through Defendant's counsel.

Respectfully submitted,

PAM SANFORD

By Counsel:

McClanahan Powers, PLLC

By: /s/ Dirk McClanahan
Dirk McClanahan (VSB No. 81208)
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2022, the foregoing was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Dirk McClanahan
Dirk McClanahan